

Exhibit E

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

LAWRENCE M. ELLIOTT)	
and)	
CELESTINE V. ELLIOTT)	
)	
Plaintiffs,)	Case No. 1:14-cv-00691-KBJ
v.)	
)	
GENERAL MOTORS LLC,)	
)	
Defendant.)	

**PLAINTIFFS' MOTION REQUESTING THAT THE COURT DEFER
CONSIDERATION OF GENERAL MOTORS LLC'S PENDING MOTION TO DISMISS**

Plaintiffs Lawrence M. and Celestine V. Elliott, by and through their undersigned counsel, hereby move to request that the Court defer consideration of General Motors LLC's ("GM's") Motion to Dismiss the Plaintiffs' *pro se* Complaint until after the Plaintiffs have an opportunity to move for leave to amend the Complaint. Plaintiffs retained counsel on June 18, 2014 and intend to seek the Court's leave to amend the Complaint in order to clarify their factual allegations and the legal bases for relief, and to make other changes in their pleadings. Clarification of the pleadings will assist the Court in assessing the sufficiency of Plaintiffs' allegations, as well as in resolving GM's contention, presumably to be filed shortly, that this Court should stay the action. Plaintiffs intend to file a motion for leave to amend by the close of business on June 28, 2014.

GM has informed co-counsel that it will not consent to Plaintiffs' forthcoming request to amend their pleadings. GM did not explicitly consent to the relief requested in the instant motion by the time of this filing.

Respectfully submitted,

/s/ Daniel Horal (D.C. Bar No. 1005381)

DATE: June 20, 2014

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